

Exhibit 1

Exhibit 1-A

1

Subject: RE: TVM Ethicon Wave 6 – Webinar Scheduled Friday, June 23, 2017_PPTs – CONFIDENTIAL COMMUNICATION

Hi Betsy. I am looking for implanter/explanter deposition transcripts involving TVT-S. Any suggestions?
Thanks - Kristen

Kristen Loerch Sipala, Esquire
Kline & Specter, P.C.
kristen.loerch@klinespecter.com
Direct Dial: 215/772-0424
Fax: 215/735-0937

From: Betsy Williams [<mailto:BWilliams@awkolaw.com>]
Sent: Friday, June 23, 2017 4:54 PM
Cc: Renee Baggett; Bryan Aylstock; Nate Jones; Mary Liu; Daniel Thornburgh
Subject: RE: TVM Ethicon Wave 6 – Webinar Scheduled Friday, June 23, 2017_PPTs – CONFIDENTIAL COMMUNICATION

Thanks everyone for joining us today for the Wave 6 prep webinar. We hope you found the information helpful and informative. We appreciate your patience as we worked through some of the technical issues with the WebEx format.

As promised, here is a Dropbox link with the Powerpoints that were used today:

<https://www.dropbox.com/> [REDACTED]

Feel free to let us know if you have any questions.

Thanks,
Bets

Betsy D. Williams
Executive Assistant to Bryan Aylstock
Aylstock, Witkin, Kreis & Overholtz

17 E. Main Street, Suite 200
Pensacola, FL 32502
Phone: (850) 202-1010
Direct Dial: (850) 266-2971
Toll Free: (888) 255-AWKO (2956)
Facsimile: (850) 916-7449
Email: bwilliams@awkolaw.com

From: Betsy Williams
Sent: Thursday, June 22, 2017 4:28 PM
Cc: Renee Baggett; Bryan Aylstock; Nate Jones; Mary Liu; Daniel Thornburgh
Subject: TVM Ethicon Wave 6 – Webinar Scheduled Friday, June 23, 2017 – CONFIDENTIAL COMMUNICATION

Good afternoon,

You are receiving this email because you expressed an interest in attending tomorrow's webinar regarding wave preparation. You should have received a separate email from Warren Price in our IT department with information on how to log in to tomorrow's webinar. Please let me know if you have not yet received that invitation.

Please note, if you are away from your computer and/or if you do not have speakers on your computer, you may also dial in to the number provided and listen while watching the presentations. If you do log in through your computer, please choose to disable your video due to the large number of folks who will be attending.

During the webinar, if you have any questions, please send them to Betsy Williams (bwilliams@awkolaw.com) with "Wave 6 Webinar Question" in the subject line. We will attempt to answer them during the webinar or at the end during the Q&A session, but if not, we will reach out to you separately to address any concerns you may have.

Attached for your review is the agenda for tomorrow's call (I am also pasting below for firms who may be having problems opening attachments). The WebEx invitation allotted 10 hours for the webinar, but we do not anticipate it lasting that long. We plan to work through lunch (so plan accordingly) and hope to be done by 3:00 p.m. central, at the latest.

Thanks,
Bryan, Renee, Tom

PLEASE REMEMBER THIS IS A PLAINTIFFS COMMUNICATION ONLY AND SHOULD NOT BE SHARED WITH DEFENSE OR OUTSIDE THIRD PARTIES.

**TVM ETHICON WAVE 6 FIRMS MEETING
DEPO AND DISCOVERY PREP
Friday, June 23, 2017, 9:00 a.m. central**

**THE MATERIALS PROVIDED AND INFORMATION DISCUSSED AT THIS MEETING ARE BEING PROVIDED
PURSUANT TO ETHICON MDL PRE-TRIAL ORDER 11 (PROTECTIVE ORDER) AND PRE-TRIAL 62
(PARTICIPATION AGREEMENT)**

- I. Opening Remarks (Renee Baggett and Bryan Aylstock)
- II. Brief Overview of Litigation & Ethicon Products
 - a. TVT-Secur Liability Story (Dan Thornburgh)
 - b. TVT, TVT-O, TVT-Abbrevio and Prosima Liability Story (Nate Jones)
 - c. Prolift and Prolift +M Liability Story (Bryan Aylstock)
- III. Case-Specific Discovery Requests (Nate Jones)
- IV. Treater Deposition Preparation (Nate Jones)

- a. Implanter Depositions-TVT Products (Nate Jones)
- b. Implanter Depositions-Prolift/Gynemesh (Nate Jones)
- c. Explanter and Treater Depositions (Nate Jones)
- d. Strategies for Getting Doctors on our Side (Nate Jones)
- V. Pathology cross exam- General & Specific (Dan Thornburgh)
- VI. Handling Pathology Specimens (Dan Thornburgh)
- VII. Daubert and Trial Briefing (Mary Liu)
- VIII. Plaintiff Deposition Preparation (Mary Liu)
- IX. Sales Representative Deposition Preparation (Mary Liu and Brad Bradford)
- X. Case-Specific Expert Deposition Overview (Renee Baggett)
- XI. Lessons Learned So Far (Bryan Aylstock and Brad Bradford)
- XII. Questions and Closing Remarks (Renee Baggett and Bryan Aylstock)

**Betsy D. Williams on behalf of Bryan
Aylstock, Renee Baggett and Tom Cartmell**
Executive Assistant to Bryan Aylstock
Aylstock, Witkin, Kreis & Overholtz

17 E. Main Street, Suite 200
Pensacola, FL 32502
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Betsy D. Williams
Executive Assistant to Bryan Aylstock
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Exhibit 1-B

-----Original Message-----

From: Baldwin, Kila B. [mailto:kila.baldwin@klinespecter.com]
Sent: April 30, 2018 2:42 PM
To: Jeff Kuntz [mailto:jkuntz@wcllp.com], Robertson, Elia [mailto:Elia.Robertson@KlineSpecter.com], Bryan Aylstock [mailto:BAylstock@awkolaw.com]
CC: Daniel Thornburgh [mailto:DThornburgh@awkolaw.com], Ben Anderson [mailto:ben@andersonlawoffices.net], Christy Hurt [mailto:CHurt@awkolaw.com], Tom P. Cartmell [mailto:tcartmell@wcllp.com], Andrew N. Faes [mailto:afaes@wcllp.com], Cindy McGaughey [mailto:cmcgaughey@wcllp.com]
Subject: RE: Designations

Thank you so much Jeff!

From: Jeff Kuntz
Sent: Monday, April 30, 2018 3:03 PM
To: Robertson, Elia ; Bryan Aylstock
Cc: Baldwin, Kila B. ; Daniel Thornburgh ; Ben Anderson ; Christy Hurt ; Tom P. Cartmell ; Andrew N. Faes ; Cindy McGaughey
Subject: RE: Designations

Yes. Andy or Cindy, can you send them hearings with Eifert for Huskey and Mullins.

From: Robertson, Elia [mailto:elia.robertson@klinespecter.com]
Sent: Monday, April 30, 2018 11:20 AM
To: Jeff Kuntz; Bryan Aylstock
Cc: Baldwin, Kila B.; Daniel Thornburgh; Ben Anderson; Christy Hurt; Tom P. Cartmell
Subject: RE: Designations

Jeff,

Do you also happen to have, or know where Kila and I could find, previous Eifert dep designation hearing transcripts? We're trying to get an idea of how Eifert has previously ruled. Thanks!

From: Jeff Kuntz [mailto:jkuntz@wcllp.com]
Sent: Saturday, April 28, 2018 10:12 AM
To: Bryan Aylstock [mailto:BAylstock@awkolaw.com]
Cc: Baldwin, Kila B. [mailto:kila.baldwin@klinespecter.com]; Daniel Thornburgh [mailto:DThornburgh@awkolaw.com]; Ben Anderson [mailto:Ben@andersonlawoffices.net]; Robertson, Elia [mailto:elia.robertson@klinespecter.com]; Christy Hurt [mailto:CHurt@awkolaw.com]; Tom P. Cartmell [mailto:tcartmell@wcllp.com]
Subject: Re: Designations

I sent. And Mullins to because they are a little more updated and cleaned up for TVT-R.

Jeffrey M. Kuntz
Wagstaff & Cartmell LLP
4740 Grand Avenue, Suite 300
Kansas City, Missouri 64112
(816) 701-1124

Fax (816) 531-2372

jkuntz@wcllp.com

<http://www.wagstaffcartmell.com>

The Missouri Bar Disciplinary Counsel requires all Missouri lawyers to notify all recipients of e-mail that (1) e-mail communication is not a secure method of communication; (2) any e-mail that is sent to you or by you may be copied and held by various computers it passes through as it goes from me to you or vice versa; (3) persons not participating in our communication may intercept our communications by improperly accessing your computer or my computer or even some computer unconnected to either of us which the e-mail passed through. I am communicating to you via e-mail because you have consented to receive communications via this medium. If you change your mind and want future communications to be sent in a different fashion, please let me know AT ONCE.

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On Apr 28, 2018, at 9:09 AM, Bryan Aylstock BAylstock@awkolaw.com> wrote:

That would be husky. Kuntz should have

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Baldwin, Kila B." kila.baldwin@klinespecter.com>

Date: 4/28/18 8:25 AM (GMT-06:00)

To: Bryan Aylstock BAylstock@awkolaw.com>

Cc: Daniel Thornburgh DThornburgh@awkolaw.com>, Ben Anderson Ben@andersonlawoffices.net>,"Robertson, Elia" elia.robertson@klinespecter.com>, Christy Hurt CHurt@awkolaw.com>

Subject: Re: Designations

Yes, Ethicon LCM TVTO.

Kila Baldwin

Sent from my iPad

On Apr 27, 2018, at 3:50 PM, Bryan Aylstock BAylstock@awkolaw.com> wrote:

What kind of case? Ethicon? We have transcripts from Elfert we can share.

From: Baldwin, Kila B. [<mailto:kila.baldwin@klinespecter.com>]

Sent: Friday, April 27, 2018 2:16 PM

To: Daniel Thornburgh DThornburgh@awkolaw.com>; Bryan Aylstock BAylstock@awkolaw.com>; Ben Anderson Ben@andersonlawoffices.net>

Cc: Robertson, Elia elia.robertson@klinespecter.com>

Subject: Designations

Do any of you have or know where I could find rulings on deposition designations that have been made previously in the MDL? Our hearing is next Friday. Thanks!

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Exhibit 1-C

From: Nate Jones

Sent: Friday, May 11, 2018 3:01 PM

To: 'Kristen.Loerch@KlineSpecter.com' <Kristen.Loerch@KlineSpecter.com>

Subject: RE: TVM MDL – Information Request – CONFIDENTIAL COMMUNICATION

Here you go!!! Good luck!!!

1. Rosenblatt

[https://wcllp.box.com/s/\[REDACTED\]](https://wcllp.box.com/s/[REDACTED]) 9 (recent deposition where he says he has worked for all mesh companies as a consultant for decades and been paid at least hundreds of thousands of dollars by them; the exhibits are his consultant agreements; he also talks about Coloplast Altis sling being softer than Obtryx)

[https://wcllp.box.com/s/\[REDACTED\]](https://wcllp.box.com/s/[REDACTED]) (poster on Pinnacle where he says it sucks)

2. Badylak

[https://wcllp.box.com/s/\[REDACTED\]](https://wcllp.box.com/s/[REDACTED]) [https://wcllp.box.com/s/\[REDACTED\]](https://wcllp.box.com/s/[REDACTED])

[https://wcllp.box.com/s/\[REDACTED\]](https://wcllp.box.com/s/[REDACTED]) (trial testimony)

[https://wcllp.box.com/s/\[REDACTED\]](https://wcllp.box.com/s/[REDACTED]) (badylak trial cross prep materials – this should be helpful all materials grouped by folder and individual articles et that stood are also separated out and highlighted)

[https://wcllp.box.com/s/\[REDACTED\]](https://wcllp.box.com/s/[REDACTED]) (prep materials)

3. Spiegelberg

[https://wcllp.box.com/s/\[REDACTED\]](https://wcllp.box.com/s/[REDACTED])

[https://wcllp.box.com/s/\[REDACTED\]](https://wcllp.box.com/s/[REDACTED])

4. Brauer

[https://wcllp.box.com/s/\[REDACTED\]](https://wcllp.box.com/s/[REDACTED])

From: Aylstock Witkin Kreis & Overholtz PLLC [mailto:bwilliams@awkolaw.com]

Sent: Friday, May 11, 2018 9:48 AM

To: Nate Jones

Subject: TVM MDL – Information Request – CONFIDENTIAL COMMUNICATION

YOU ARE RECEIVING THIS COMMUNICATION AS PART OF AN EMAIL LIST FOR FIRMS INVOLVED IN THE TVM LITIGATION. PLEASE REVIEW AND DISREGARD IF THE SPECIFIC TOPIC(S) DOES NOT APPLY TO YOU OR YOUR TVM CLIENTS.

Good morning,

Leadership once again needs your help to gather some information.

Kline & Specter is beginning a BSC trial in a couple weeks and was hoping to gather additional information on the following defense experts:

Peter Rosenblatt, MD/Harvard

Stephen Badylak, DVM, PhD, MD/University of Pittsburgh

Stephen Spiegelberg, PhD/Cambridge Polymer Group

Steven Little, PhD/University of Pittsburgh

Christine Brauer, Ph.D/Brauer Device Consultants, LLC

Matthew Davies, MD

Lonny Green, MD/Virginia Women's

After obtaining everything available through Golkow and TrialSmith, they were hoping folks would be willing to share any transcripts or reports to assist them with their trial prep. If you have any useful information to share, please reach out to Kristen Loerch (Kristen.Loerch@KlineSpecter.com).

Thanks,

Bryan Aylstock

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17 E. Main Street, Suite 200
Pensacola, FL 32502

Betsy D. Williams on behalf of Bryan Aylstock Phone: (850) 202-1010

Executive Assistant to Bryan Aylstock
Aylstock, Witkin, Kreis & Overholtz

Direct Dial: (850) 266-2971

Toll Free: (888) 255-AWKO (2956)

Facsimile: (850) 916-7449

Email: bwilliams@awkolaw.com

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Exhibit 1-D

From: Loerch, Kristen kristen.loerch@klinespecter.com
Subject: Re: Materials on BSC Experts for Trial
Date: May 12, 2018 at 6:38 AM
To: John Grinnan JGrinnan@TrialLawFirm.com
Cc: W. Michael Moreland MMoreland@TrialLawFirm.com, Scott Love SLove@TrialLawFirm.com



Many thanks!

Sent from my iPhone

On May 11, 2018, at 5:32 PM, John Grinnan <JGrinnan@TrialLawFirm.com> wrote:

Kristen,

Here is a link to materials on BSC experts that Clark, Love & Hutson compiled for Kline & Specter's upcoming trial against BSC: <https://clarklovehutsongp.box.com> [REDACTED]

If there is anything else Leadership can provide, please let me know – we are happy to help.

Regards,

John Grinnan

<Image001.png>

John Grinnan
Clark, Love & Hutson, GP
440 Louisiana Street, Suite 1600 | Houston, Texas 77002
713-425-5321 (Telephone) | 713-759-1217 (Fax)
JGrinnan@TrialLawFirm.com | www.TrialLawFirm.com

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From: Aylstock Witkin Kreis & Overholtz PLLC <bwilliams@awkolaw.com>
Sent: Friday, May 11, 2018 9:28 AM
To: John Grinnan <JGrinnan@TrialLawFirm.com>
Subject: TVM MDL – Information Request – CONFIDENTIAL COMMUNICATION

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Stephen Badylak, DVM, PhD, MD/University of Pittsburgh

Stephen Spiegelberg, PhD/Cambridge Polymer Group

Steven Little, PhD/University of Pittsburgh

Christine Brauer, Ph.D/Brauer Device Consultants, LLC

Matthew Davies, MD

Lonny Green, MD/Virginia Women's

After obtaining everything available through Golkow and TrialSmith, they were hoping folks would be willing to share any transcripts or reports to assist them with their trial prep. If you have any useful information to share, please reach out to Kristen Loerch (Kristen.Loerch@KlineSpecter.com).

Thanks,

Bryan Aylstock

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17 E. Main Street, Suite 200
Pensacola, FL 32502

Betsy D. Williams on behalf of Bryan Aylstock Phone: (850) 202-1010

Executive Assistant to Bryan Aylstock
Aylstock, Witkin, Kreis & Overholtz

Direct Dial: (850) 266-2971

Toll Free: (888) 255-AWKO (2956)

Facsimile: (850) 916-7449

Email: bwilliams@awkolaw.com

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clarklovehutson

A General Partnership of Attorneys and Counselors at Law

Exhibit 1-E

Amy Eskin

From: Loerch, Kristen <kristen.loerch@klinespecter.com>
Sent: Friday, April 26, 2019 9:02 AM
To: Bessis, Marissa; Fitzpatrick, Fidelma; Wallace, Edward; Amy Eskin; Safier, Regan S.; Robertson, Elia; Coney, Lori; Balefsky, Lee
Subject: RE: EXTERNAL-AMS DE

THANK YOU!!!

From: Bessis, Marissa <mbessis@motleyrice.com>
Sent: Friday, April 26, 2019 11:58 AM
To: Fitzpatrick, Fidelma <ffitzpatrick@motleyrice.com>; Loerch, Kristen <kristen.loerch@klinespecter.com>; Wallace, Edward <EAW@wexlerwallace.com>; Amy Eskin (aeskin@schneiderwallace.com) <aeskin@schneiderwallace.com>; Safier, Regan S. <regan.safier@klinespecter.com>; Robertson, Elia <elia.robertson@klinespecter.com>; Coney, Lori <lori.coney@klinespecter.com>; Balefsky, Lee <lee.balefsky@klinespecter.com>
Subject: RE: EXTERNAL-AMS DE

The sharefile has been created and is located here:

[https://motleyrice.sharefile.com/\[REDACTED\]](https://motleyrice.sharefile.com/[REDACTED])

It is user-specific, so if someone else from your firm (other than those copied on this email) needs access, please send me their names and email addresses.

Thanks.

Marissa Bessis | Paralegal | Motley Rice LLC
28 Bridgeside Blvd. | Mt. Pleasant, SC 29464
o. 843.216.9283 | f. 843.416.5383 | mbessis@motleyrice.com

From: Fitzpatrick, Fidelma <ffitzpatrick@motleyrice.com>
Sent: Friday, April 26, 2019 11:51 AM
To: Loerch, Kristen <kristen.loerch@klinespecter.com>; Wallace, Edward <EAW@wexlerwallace.com>; Amy Eskin (aeskin@schneiderwallace.com) <aeskin@schneiderwallace.com>; Safier, Regan S. <regan.safier@klinespecter.com>; Robertson, Elia <elia.robertson@klinespecter.com>; Coney, Lori <lori.coney@klinespecter.com>; Balefsky, Lee <lee.balefsky@klinespecter.com>
Cc: Bessis, Marissa <mbessis@motleyrice.com>
Subject: RE: EXTERNAL-AMS DE

Marissa – Can you send the Barba transcripts to this group? Thanks.

Fidelma Fitzpatrick | Attorney at Law | Motley Rice LLC
55 Cedar St., STE 100 | Providence, RI 02903
o. 401.457.7728 x7728 | f. 401.457.7708 | ffitzpatrick@motleyrice.com

From: Loerch, Kristen <kristen.loerch@klinespecter.com>

Sent: Wednesday, April 24, 2019 5:24 PM

To: Fitzpatrick, Fidelma <ffitzpatrick@motleyrice.com>; Wallace, Edward <EAW@wexlerwallace.com>; Amy Eskin <aeskin@schneiderwallace.com> <aeskin@schneiderwallace.com>; Safier, Regan S. <regan.safier@klinespecter.com>; Loerch, Kristen <kristen.loerch@klinespecter.com>; Robertson, Elia <elia.robertson@klinespecter.com>; Coney, Lori <lori.coney@klinespecter.com>; Balefsky, Lee <lee.balefsky@klinespecter.com>

Subject: EXTERNAL-AMS DE

Fidelma and Ed – thanks for the chat today. Just sending this f/up email to confirm our to do list. I apologize for the length of the email. Thanks again! Kristen

Amy - Per Ed/Fidelma, you are the keeper of the list of attorneys handling active AMS cases. We were hoping you could provide this to us so that we could reach out; coordinate resources; etc.

Amy – It would be great if we could set up that video call with you.

Ed/Fidelma – you were going to send us the transcripts from the last mesh case before Judge Johnson. I don't recall the name

Ed – you will be following up with Barbara to find out if any case specific discovery was served in the AMS MDL which should have also been served in our cases and will send to us along with all other materials AMS produces in this litigation. Someone will also confirm with Crivella that the AMS documents are uploaded and available in an obvious location :

Kline & Specter AMS DE clients:

Jyoti Bathija- 148915

Janice Berner- 177209

Yvonne Brustein- 170786

Susan Chatman- 174676

Elizabeth Clark- 133952

Cherri Davis- 170897

Suzanne Felde-142154

Ana Gluhic-Popvic- 142154

Joanne Hamilton- 173219

Constance Holden- 169494

Shirley Joyner- 170502

Phyllis Martinez- 318365

Debra Miller- 174015

Judy Odell- 172319

Michele Phillips- 174673

Phyllis Powell, Dec'd.- 322249

Lisa Roy- 141073

Melissa Touville- 163831

Susan Varga- 174533

Kristen Loerch Sipala, Esquire
Kline & Specter, P.C.
1525 Locust Street, 19th Floor
Philadelphia, PA 19102
215-772-1000
Direct Dial: 215-772-0424
Fax: 215-735-0937

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Exhibit 1-F

Amy Eskin

From: Amy Eskin
Sent: Wednesday, May 15, 2019 1:12 PM
To: Loerch, Kristen; Coney, Lori
Cc: eaw@wexlerwallace.com; yflahertymflaherty@locklaw.com
Subject: RE: AMS DE

He is in AMS Sling and Pop folder/Experts/Plaintiff Sling Experts



SCHNEIDER WALLACE
COTTRELL KONECKY
WOTKYNs LLP

Amy Eskin
2000 Powell Street, Suite 1400
Emeryville, California 94608
Main: (415) 421-7100
Direct Dial: (510) 740-2936
Fax: (415) 421-7105
www.schneiderwallace.com

From: Loerch, Kristen [mailto:kristen.loerch@klinespecter.com]
Sent: Wednesday, May 15, 2019 12:33 PM
To: Amy Eskin <aeskin@schneiderwallace.com>; Coney, Lori <lori.coney@klinespecter.com>
Cc: eaw@wexlerwallace.com; yflahertymflaherty@locklaw.com; Loerch, Kristen <kristen.loerch@klinespecter.com>
Subject: RE: AMS DE

I have the drop box and corporate depositions. He is not in the drop box unless he has another name or I am blind which is possible too. The only "Michael" deps I see in the drop box are Michael Ryan and Michael Beller...

From: Amy Eskin <aeskin@schneiderwallace.com>
Sent: Wednesday, May 15, 2019 3:26 PM
To: Loerch, Kristen <kristen.loerch@klinespecter.com>; Coney, Lori <lori.coney@klinespecter.com>
Cc: eaw@wexlerwallace.com; yflahertymflaherty@locklaw.com
Subject: RE: AMS DE

His depo is in the drop box. Let me know if you can't find it. I thought Ed and Yvonne would have insight into him as a witness in general

From: Loerch, Kristen [mailto:kristen.loerch@klinespecter.com]
Sent: Wednesday, May 15, 2019 12:25 PM
To: Amy Eskin <aeskin@schneiderwallace.com>; Coney, Lori <lori.coney@klinespecter.com>
Cc: eaw@wexlerwallace.com; yflahertymflaherty@locklaw.com; Loerch, Kristen <kristen.loerch@klinespecter.com>
Subject: RE: AMS DE

Thanks Amy – Ed/Yvonne – can you help. Amy suggested that Kalsher's deposition was a must read. Thank you! Kristen

From: Amy Eskin <aeskin@schneiderwallace.com>
Sent: Wednesday, May 15, 2019 3:22 PM

To: Loerch, Kristen <kristen.loerch@klinespecter.com>; Coney, Lori <lori.coney@klinespecter.com>
Cc: eaw@wexlerwallace.com; yflahertymflaherty@locklaw.com
Subject: RE: AMS DE

Its Michael Kalsher. We withdrew him before trial. Ed Wallace and Yvonne Flaherty were primarily responsible for him in the first wave. they would know best. Copying them.
Thanks

From: Loerch, Kristen [<mailto:kristen.loerch@klinespecter.com>]
Sent: Wednesday, May 15, 2019 11:46 AM
To: Amy Eskin <aeskin@schneiderwallace.com>; Loerch, Kristen <kristen.loerch@klinespecter.com>; Coney, Lori <lori.coney@klinespecter.com>
Subject: AMS DE

Hey there Amy. You mentioned a failure to warn witness during our recent chat. I can't read my handwriting and am embarrassed to ask what the person's name is but I am going to ask anyway. I have Michael or Michelle Kalsher? Not even sure if I am remotely close. I do see a deposition for a Michelle Solari – is that who you were referring to by chance? Also attached is my list of AMS counsel who may still have cases. Can you pls combine with yours and send the full list to me so that I can send out an email to the group? Hope so and thanks! Kristen

Kristen Loerch Sipala, Esquire
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1525 Locust Street, 19th Floor
Philadelphia, PA 19102
215-772-1000
Direct Dial: 215-772-0424
Fax: 215-735-0937

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Exhibit 1-G

Amy Eskin

From: Amy Eskin
Sent: Wednesday, May 29, 2019 11:16 AM
To: Loerch, Kristen; Fitzpatrick, Fidelma; Edward Wallace; Safier, Regan S.; Robertson, Elia; Coney, Lori
Subject: RE: AMS - Dep of Dr. Rosenzweig
Attachments: Rosenzweig 20181029 COD.PDF; ROSENZWEIG CT Kilgore.pdf; ROSENZWEIG CT Carter.pdf

See attached



**SCHNEIDER WALLACE
COTTRELL KONECKY
WOTKYNs LLP**

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From: Loerch, Kristen [mailto:kristen.loerch@klinespecter.com]
Sent: Wednesday, May 29, 2019 8:07 AM
To: Fitzpatrick, Fidelma <ffitzpatrick@motleyrice.com>; Amy Eskin <aeskin@schneiderwallace.com>; Edward Wallace <eaw@wexlerwallace.com>; Loerch, Kristen <kristen.loerch@klinespecter.com>; Safier, Regan S. <regan.safier@klinespecter.com>; Robertson, Elia <elia.robertson@klinespecter.com>; Coney, Lori <lori.coney@klinespecter.com>
Subject: AMS - Dep of Dr. Rosenzweig

Hi Fidelma. You presented Dr. Rosenzweig for deposition in carter on 1/18/16. Could you please send the exhibits to us. They weren't included in the drop box. If not, can you tell me who would be able to help. Thanks.

Kristen Loerch Sipala, Esquire
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Exhibit 1-H

Amy Eskin

From: Loerch, Kristen <kristen.loerch@klinespecter.com>
Sent: Wednesday, May 29, 2019 11:31 AM
To: Amy Eskin
Cc: Loerch, Kristen; Safier, Regan S.
Subject: RE: AMS - Dep of Dr. Rosenzweig

Hi – within the next couple of weeks is perfect.

From: Amy Eskin <aeskin@schneiderwallace.com>
Sent: Wednesday, May 29, 2019 2:30 PM
To: Loerch, Kristen <kristen.loerch@klinespecter.com>
Subject: RE: AMS - Dep of Dr. Rosenzweig

Is this super time sensitive? I am not available to track it doewn today



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From: Loerch, Kristen [<mailto:kristen.loerch@klinespecter.com>]
Sent: Wednesday, May 29, 2019 11:26 AM
To: Amy Eskin <aeskin@schneiderwallace.com>; Fitzpatrick, Fidelma <ffitzpatrick@motleyrice.com>; Edward Wallace <eaw@wexlerwallace.com>; Safier, Regan S. <regan.safier@klinespecter.com>; Robertson, Elia <elia.robertson@klinespecter.com>; Coney, Lori <lori.coney@klinespecter.com>
Subject: RE: AMS - Dep of Dr. Rosenzweig

Thanks Amy. I really really need the deposition exhibits. I have the depositions...Thank you. Kristen

From: Amy Eskin <aeskin@schneiderwallace.com>
Sent: Wednesday, May 29, 2019 2:16 PM
To: Loerch, Kristen <kristen.loerch@klinespecter.com>; Fitzpatrick, Fidelma <ffitzpatrick@motleyrice.com>; Edward Wallace <eaw@wexlerwallace.com>; Safier, Regan S. <regan.safier@klinespecter.com>; Robertson, Elia <elia.robertson@klinespecter.com>; Coney, Lori <lori.coney@klinespecter.com>
Subject: RE: AMS - Dep of Dr. Rosenzweig

See attached



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From: Loerch, Kristen [<mailto:kristen.loerch@klinespecter.com>]

Sent: Wednesday, May 29, 2019 8:07 AM

To: Fitzpatrick, Fidelma <ffitzpatrick@motleyrice.com>; Amy Eskin <aeskin@schneiderwallace.com>; Edward Wallace <eaw@wexlerwallace.com>; Loerch, Kristen <kristen.loerch@klinespecter.com>; Safier, Regan S. <regan.safier@klinespecter.com>; Robertson, Elia <elia.robertson@klinespecter.com>; Coney, Lori <lori.coney@klinespecter.com>

Subject: AMS - Dep of Dr. Rosenzweig

Hi Fidelma. You presented Dr. Rosenzweig for deposition in carter on 1/18/16. Could you please send the exhibits to us. They weren't included in the drop box. If not, can you tell me who would be able to help. Thanks.

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Amy Eskin 2000 Powell Street, Suite 1400 Emeryville, California 94608 (415) 421-7100 (800) 689-0024 (415) 421-7105 www.schneiderwallace.com

Exhibit 1-I

From: Loerch, Kristen <kristen.loerch@klinespector.com>
Sent: Monday, June 03, 2019 11:46 AM
To: Jeff Kuntz <jkuntz@wcllp.com>; Balefsky, Lee <lee.balefsky@klinespector.com>; Tom P. Cartmell <tcartmell@wcllp.com>; Nate Jones <njones@wcllp.com>; Diane K. Watkins <dwatkins@wcllp.com>; Safier, Regan S. <regan.safier@klinespector.com>; Robertson, Elia <elia.robertson@klinespector.com>; Coney, Lori <lori.coney@klinespector.com>; Loerch, Kristen <kristen.loerch@klinespector.com>
Subject: FW: Gluhic-Popovic v. AMS

Pls see defense expert reports just produced in our monarc case. Please read in the context of my initial email and thank you. Kristen

From: McCloskey, Kyle <KMccloskey@ReedSmith.com>
Sent: Thursday, May 30, 2019 5:35 PM
To: Leoni, Rob <rleoni@mslde.com>; Balefsky, Lee <lee.balefsky@klinespector.com>; Safier, Regan S. <regan.safier@klinespector.com>; Robertson, Elia <elia.robertson@klinespector.com>; rob.leoni@klinespector.com
Cc: Ritch Rocks, Heather A. <hritchrocks@reedsmith.com>; Chadick, Stephanie Q <SChadick@reedsmith.com>
Subject: Gluhic-Popovic v. AMS

Good Afternoon. Please find Defense Expert Disclosures and Reports in this matter.

Thanks
Kyle

Kyle McCloskey
Senior Paralegal
+1-215-851-8243
kmccloskey@reedsmith.com

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Three Logan Square
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1717 Arch Street
Philadelphia, PA 19103
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Fax +1 215 851 1420

* * *

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Amy Eskin

From: Amy Eskin
Sent: Thursday, June 6, 2019 7:12 AM
To: 'Loerch, Kristen'
Cc: Safier, Regan S.; Robertson, Elia; Coney, Lori
Subject: RE: AMS DE

Ok – I can get you the general depositions as MDL Leadership handled those. The motions as to Becker were filed in the Serrano case (I think I sent you the case number already?) I can try to find some of the lawyers who had the others like Juma as case specific experts. Is that what you are looking for? Im sorry if I am not understanding your question, maybe we should talk on the phone rather than by email. You can call my cell today if you like [REDACTED]



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From: Loerch, Kristen <kristen.loerch@klinespecter.com>
Sent: Thursday, June 6, 2019 3:41 AM
To: Amy Eskin <aeskin@schneiderwallace.com>
Cc: Loerch, Kristen <kristen.loerch@klinespecter.com>; Safier, Regan S. <regan.safier@klinespecter.com>; Robertson, Elia <elia.robertson@klinespecter.com>; Coney, Lori <lori.coney@klinespecter.com>
Subject: RE: AMS DE

Morning Amy. You indicate below that you 'left the case specific depositions to case counsel and MDL leader ship handled the general expert depositions and Daubert motions.' It sure would be nice to get my hands on the motions and other general expert depositions. It would also be nice to get that list serve that you started for all AMS counsel. I could use the benefit of everyone's wisdom.

From: Amy Eskin <aeskin@schneiderwallace.com>
Sent: Wednesday, June 5, 2019 8:42 PM
To: Loerch, Kristen <kristen.loerch@klinespecter.com>
Subject: Re: AMS DE

It looked like two letter Ts on my iPhone sorry.
I don't know what you mean by put me in touch with MDL leader ship ?

Amy Eskin

Schneider Wallace
Direct: (510) 740-2936

On Jun 5, 2019, at 5:38 PM, Loerch, Kristen <kristen.loerch@klinespecter.com> wrote:

Thank you Amy – I appreciate your help very much! Can you put me in touch with MDL leadership? Perhaps they can help me get a hold of the other transcripts and motions. PS –TT Is the symbol for plaintiff don't you remember it from last school? Old habits die hard for me I guess!

On Jun 5, 2019, at 8:23 PM, Amy Eskin <aeskin@schneiderwallace.com> wrote:

Kristen: thanks for your email. Let me start by saying that it looks like all of the reports you attached from Dr. Juma and Dr. Fagan and others (except Becker, Coad Kozak, Badylak and Goldberg) are case specific reports.

I am sure that these cs experts were used as case specific experts in other waves but I really have no way of knowing in which cases they were used because we left the case specific depositions to case counsel and MDL leader ship handled the general expert depositions and Daubert motions.

With respect to the general experts the only report I know from Dr. Kozak as a general expert is the one that Bryan and Dan Thornburg deposed him on in the MDL which I believe was sent to you. I would suggest that you compare the case specific report you got in your two cases from Kozak with that one.

The MDL did not disclose an expert on the rationale for an MSDS; the MSDS story in the AMS MDL is quite different than the MSDS story in say the Boston scientific MDL And although I haven't read Dr. Goldberg's report very closely I'm not even sure it's the proper subject of expert testimony anyway. Finally I'm not sure what you mean by "TT expert" In this regard.

Finally let me give some thought to the question you raise about Dr. Parisian. Dr. Becker was deposed in 2013 regarding her opinions and we filed a Daubert motion but judge Goodwin did not rule on it. Subsequently as you know Judge goodwin ruled that FDA testimony was inadmissible and the fourth circuit affirmed.

I understand that Judge Johnston has ruled that this evidence will be admissible in Delaware. I will give some thought to your question and circle back with you.

Thanks

Amy Eskin

Schneider Wallace
Direct: (510) 740-2936

On Jun 3, 2019, at 9:36 AM, Loerch, Kristen <kristen.loerch@klinespecter.com> wrote:

Hi Amy, Ed and Fidelma. We received AMS reports in our two cases: Clark (elevate; mini-sling) and Gluhic Popovic (monarc). We are trying to figure out if the **Kozak** report dated 3/22/19 contains anything new but have nothing to compare it to. Ques: Can you please send to me all Kozak reports produced to date. There is a report from **Goldberg** dated 5/28/19 re: intended use of MSDS. This looks new. But I am not sure if

there is anything we are missing. Ques: Is it new and which TT expert would be used to rebut? I don't recall an expert that fits that bill. There is a new report from Becker dated 5/30/19. Ques: Is there an expert who will can rebut Becker? Parisian is retired and will not help. I will send you the reports in the next 2 emails. Thank you. Kristen

Kristen Loerch Sipala, Esquire
Kline & Specter, P.C.
1525 Locust Street, 19th Floor
Philadelphia, PA 19102
215-772-1000
Direct Dial: 215-772-0424
Fax: 215-735-0937

Exhibit 1-J

From: Andrew N. Faes <afaes@wcllp.com>
Sent: Monday, June 17, 2019 12:38 PM
To: 'Pasquarello, Philip'; Jeff Kuntz
Cc: Cindy McGaughey
Subject: RE: Salil Khandwala

Khandawala outline & docs

<https://wcllp.box.com/> [REDACTED]

"commercial"

<https://wcllp.box.com/> [REDACTED]

From: Pasquarello, Philip [mailto:philip.pasquarello@klinespecter.com]
Sent: Monday, June 17, 2019 11:29 AM
To: Jeff Kuntz
Cc: Andrew N. Faes; Cindy McGaughey
Subject: Re: Salil Khandwala

Thank you all so much.

From: Jeff Kuntz <jkuntz@wcllp.com>
Sent: Monday, June 17, 2019 10:58:22 AM
To: Pasquarello, Philip
Cc: Andrew N. Faes; Cindy McGaughey
Subject: RE: Salil Khandwala

Thanks. No problem. Andy/Cindy—send Philip the folder on Khandwala with the video. Andy, send our final cross outlines and all the stuff. Good luck.

From: Pasquarello, Philip [mailto:philip.pasquarello@klinespecter.com]
Sent: Monday, June 17, 2019 9:51 AM
To: Jeff Kuntz
Subject: Salil Khandwala

Jeff,

My name is Philip Pasquarello and I am an attorney at Kline and Specter in Philadelphia. I am currently trying a Prolift case and Salil Khandwala is the general expert for Ethicon. I read the transcript of your cross

examination in Kaiser (which was excellent) and was wondering where I might obtain the video from the commercial that Dr. Khandwala appeared in for Ethicon in 2007. I appreciate any assistance you can provide.

Phil

Philip M. Pasquarello, Esq.

Kline & Specter, P.C.

1525 Locust Street, 19th Floor

Philadelphia, PA 19102

215.772.1364 (Direct Dial)

philip.pasquarello@klinespecter.com

Exhibit 1-K

Amy Eskin

From: Loerch, Kristen <kristen.loerch@klinespecter.com>
Sent: Tuesday, June 18, 2019 1:18 PM
To: Amy Eskin; Loerch, Kristen; Robertson, Elia; Safier, Regan S.; Coney, Lori
Subject: AMS DE

Hey there Amy! How are you ? Trying to locate the previously done dep cuts for trial. I see on the drop box you sent a folder called CORPORATE DEPOSITIONS > Annotated transcripts for sling trial cuts. It looks like there are dep cuts there. Are there other dep cuts for the POP products by chance? Thanks. Kristen

Kristen Loerch Sipala, Esquire
Kline & Specter, P.C.
1525 Locust Street, 19th Floor
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215-772-1000
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Fax: 215-735-0937

Exhibit 1-L

From: Loerch, Kristen <kristen.loerch@klinespecter.com>

Sent: Thursday, June 20, 2019 9:14 AM

To: Jeff Kuntz <jkuntz@wcllp.com>; Tom P. Cartmell <tcartmell@wcllp.com>; Nate Jones <njones@wcllp.com>; Diane K. Watkins <dwatkins@wcllp.com>; Safier, Regan S. <regan.safier@klinespecter.com>; Robertson, Elia <elia.robertson@klinespecter.com>; Coney, Lori <lori.coney@klinespecter.com>; Leoni, Rob <rleoni@mslde.com>

Subject: RE: AMS DE & Hargens

Hi everyone. How are you ? Hoping you can help. Was wondering if you could send your responses and MOLS to the Motions filed in Hargens against Guelcher; Iakovlev; Mays; Rosi. I sure would appreciate it. Thanks! Kristen

Kristen Loerch Sipala, Esquire
Kline & Specter, P.C.
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Exhibit 1-M

Amy Eskin

From: Amy Eskin
Sent: Tuesday, June 25, 2019 2:00 PM
To: Loerch, Kristen
Subject: RE: AMS DE
Attachments: 092618dostergard (2).pdf



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www.schneiderwallace.com

From: Loerch, Kristen [<mailto:kristen.loerch@klinespecter.com>]
Sent: Tuesday, June 25, 2019 7:44 AM
To: Amy Eskin <aeskin@schneiderwallace.com>
Cc: Loerch, Kristen <kristen.loerch@klinespecter.com>
Subject: RE: AMS DE

Wonderful and thank you!

From: Amy Eskin <aeskin@schneiderwallace.com>
Sent: Tuesday, June 25, 2019 10:39 AM
To: Loerch, Kristen <kristen.loerch@klinespecter.com>
Subject: Re: AMS DE

You figured it out
Yes the wave list
I found one depo
I will send shortly

Amy Eskin

Schneider Wallace
Direct: (510) 740-2936

On Jun 25, 2019, at 6:20 AM, Loerch, Kristen <kristen.loerch@klinespecter.com> wrote:

Hello everyone. Amy Eskin was kind enough to provide your contact info. Our Firm is actively pursuing cases against AMS in Delaware state court. We try the first case in December. We are looking for

transcripts and are hoping you could send our way any transcripts you have on Dr. Osterguard
- particularly those taken in any AMS case. Thanks very much. Kristen

Kristen Loerch Sipala, Esquire
Kline & Specter, P.C.
1525 Locust Street, 19th Floor
Philadelphia, PA 19102
215-772-1000
Direct Dial: 215-772-0424
Fax: 215-735-0937

Exhibit 1-N

Karen Schroeder

From: Karen Schroeder
Sent: Tuesday, August 27, 2019 3:47 PM
To: Riley Burnett
Subject: FW: General expert deposition of Dr. Bruce Rosenzweig

From: Karen Schroeder
Sent: Friday, June 28, 2019 2:43 PM
To: Goodall, Jonathan <jonathan.goodall@klinespecter.com>
Subject: RE: General expert deposition of Dr. Bruce Rosenzweig

I will invite you to the dropbox link.

Karen

From: Goodall, Jonathan <jonathan.goodall@klinespecter.com>
Sent: Friday, June 28, 2019 2:01 PM
To: Karen Schroeder <Karen.Schroeder@rburnettlaw.com>
Subject: General expert deposition of Dr. Bruce Rosenzweig

Please forward a copy of Dr. Rosenzweig's general expert deposition taken for the Coloplast MDL in late April.

Thank you,

Jon Goodall, Esq.
Kline & Specter, P.C.

Exhibit 1-O

Karen Schroeder

From: Karen Schroeder
Sent: Tuesday, August 27, 2019 2:54 PM
To: Riley Burnett
Subject: Fwd: Recent depositions

Karen Beyea-Schroeder

From: Karen Schroeder
Sent: Wednesday, August 14, 2019 3:22:36 PM
To: Goodall, Jonathan <jonathan.goodall@klinespecter.com>
Subject: RE: Recent depositions

Same dropboxes. All experts are in the one. All employee transcripts are also in the other.

From: Goodall, Jonathan <jonathan.goodall@klinespecter.com>
Sent: Wednesday, August 14, 2019 2:51 PM
To: Karen Schroeder <Karen.Schroeder@rburnettlaw.com>
Subject: Recent depositions

I was wondering if any transcripts of Coloplast employees or experts have come in since your last Dropbox of 6.28.19?

Thank you,

Jon Goodall, Esq.
Kline & Specter, P.C.

Exhibit 1-P

Karen Schroeder

From: Karen Schroeder
Sent: Tuesday, August 27, 2019 2:53 PM
To: Riley Burnett
Subject: Fwd: Cloud Nine access

Karen Beyea-Schroeder

From: Kyle Taylor <ktaylor@cloudnine.com>
Sent: Thursday, August 15, 2019 12:31:19 PM
To: Karen Schroeder <Karen.Schroeder@rburnettlaw.com>; Goodall, Jonathan <jonathan.goodall@klinespecter.com>
Subject: RE: Cloud Nine access

Hi Jonathan,

You have been enrolled in the MDL database. I noticed that you already have a CloudNine account so the database will be available the next time you log in. Please let me know if you have any trouble accessing the database.

Thanks,
Kyle Taylor
Direct: 713.814.9016 | Mobile: 480.282.0415
[CloudNine](#) | cloudnine.com/support

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From: Karen Schroeder <Karen.Schroeder@rburnettlaw.com>
Sent: Thursday, August 15, 2019 9:04 AM
To: Goodall, Jonathan <jonathan.goodall@klinespecter.com>
Cc: Kyle Taylor <ktaylor@cloudnine.com>; Kyle Taylor <ktaylor@cloudnine.com>
Subject: Re: Cloud Nine access

*** External Email ***
Kyle

Can you please get Jonathan access?

Thanks

Karen Beyea-Schroeder

From: Goodall, Jonathan <jonathan.goodall@klinespecter.com>
Sent: Thursday, August 15, 2019 10:57:13 AM
To: Karen Schroeder <Karen.Schroeder@rburnettlaw.com>
Subject: Cloud Nine access

How does Kline & Specter go about regaining access to the MDL 2387 docs on Cloud Nine? I've signed the PTO already -just need to know instructions on regaining access.

Thank you,

Jon Goodall, Esq.
Kline & Specter, P.C.

Exhibit 1-Q

Karen Schroeder

From: Karen Schroeder
Sent: Wednesday, August 28, 2019 12:49 PM
To: Riley Burnett
Subject: FW: Recent depositions

From: Goodall, Jonathan <jonathan.goodall@klinespecter.com>
Sent: Wednesday, August 28, 2019 12:48 PM
To: Karen Schroeder <Karen.Schroeder@rburnettlaw.com>
Cc: Gomez, Christopher <chris.gomez@klinespecter.com>
Subject: RE: Recent depositions

Much obliged!

From: Karen Schroeder <Karen.Schroeder@rburnettlaw.com>
Sent: Wednesday, August 28, 2019 1:46 PM
To: Goodall, Jonathan <jonathan.goodall@klinespecter.com>
Cc: Gomez, Christopher <chris.gomez@klinespecter.com>
Subject: RE: Recent depositions

Do you still have access the to dropbox as I do put them all in there. We don't have Looms and Aagaard yet as we only took those Friday and Monday.

Here is the link again:

<https://www.dropbox.com/> [REDACTED]

This has all of the hot docs, depositions, etc.

Karen

From: Goodall, Jonathan <jonathan.goodall@klinespecter.com>
Sent: Wednesday, August 28, 2019 12:39 PM
To: Karen Schroeder <Karen.Schroeder@rburnettlaw.com>
Cc: Gomez, Christopher <chris.gomez@klinespecter.com>
Subject: Recent depositions

Can you pass along the recent deposition transcripts of Hovard and Looms, and any other deps taken since you sent me the last tranche of deps?

Thank you,

Jon Goodall, Esq.
Kline & Specter, P.C.